

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RYAN LESSEM and DOUGLAS JOHNSON,

Plaintiffs,

v.

JAYCEON TERRELL TAYLOR p/k/a THE
GAME, UMG RECORDINGS, INC.,
UNIVERSAL MUSIC GROUP, INC.,
INTERSCOPE RECORDS, INC., LASTRADA
ENTERTAINMENT COMPANY, LTD.,
SONY/ATV MUSIC PUBLISHING, LLC,
UNIVERSAL MUSIC CORPORATION,
WARNER CHAPPELL MUSIC INC., MUSIC
OF WINDSWEPT, BLACK WALL STREET
RECORDS, LLC and BLACK WALL
STREET PUBLISHING, LLC,

Defendants.

CASE NO. 07 CV-10601

**RULE 26(a) INITIAL DISCLOSURES OF
UMG RECORDINGS, INC., INTERSCOPE
RECORDS, A DIVISION OF UMG
RECORDINGS AND UNIVERSAL MUSIC
PUBLISHING GROUP, INC.**

Pursuant to Rule 26(a) of the Federal Rules of Civil Procedure, defendants UMG Recordings, Inc. ("UMG"), Interscope Records, a division of UMG Recordings, Inc. (sued incorrectly as Interscope Records, Inc.) and Universal Music Publishing Group Inc. ("UMPG", sued incorrectly as Universal Music Corporation and/or Universal Music Group, Inc.) (the "Universal Defendants"), by their attorneys, Mitchell Silberberg & Knupp LLP, hereby make the following initial disclosures:

**A. Rule 26(a)(1)(A) - Persons Likely to Have
Discoverable Information Regarding Liability Issues**

1. Jayceon Terrell Taylor, p/k/a "The Game"

Subjects: The creation and recording of "How We Do," identified in the Complaint as the allegedly infringing composition, and any alleged access to plaintiffs' composition "Elevator," identified in the Complaint as the allegedly infringed composition.

2. Andre Young p/k/a "Dr. Dre"

Subjects: The creation and recording of "How We Do," identified in the Complaint as the allegedly infringing composition, and any alleged access to plaintiffs' composition "Elevator," identified in the Complaint as the allegedly infringed composition.

3. Michael Elizondo

Subjects: The creation and recording of "How We Do," identified in the Complaint as the allegedly infringing composition, and any access to plaintiffs' composition "Elevator," identified in the Complaint as the allegedly infringed composition.

4. Curtis Jackson p/k/a "50 Cent"

Subjects: The creation and recording of "How We Do," identified in the Complaint as the allegedly infringing composition, and any access to plaintiffs' composition "Elevator," identified in the Complaint as the allegedly infringed composition.

5. Ryan Lessem

Subjects: The creation and recording of "Elevator," the allegedly infringed composition, any alleged infringement by any defendant of the composition "Elevator," any exploitation of the composition or recording of "Elevator," including any licensing, performance,

sale, or distribution thereof, plaintiffs' alleged damages, and all other matters alleged in the Complaint.

6. **Douglas Johnson**

Subjects: The creation and recording of "Elevator," the allegedly infringed composition, any alleged infringement by any defendant of the composition "Elevator," any exploitation of the composition or recording of "Elevator," including any licensing, performance, sale, or distribution thereof, plaintiffs' alleged damages, and all other matters alleged in the Complaint.

Defendants' investigation is ongoing, and additional individuals may be identified who have relevant information. Defendants reserve their right to identify further additional individuals regarding liability issues and, at the appropriate juncture, any individual who may have relevant information regarding alleged damages.

B. **Rule 26(a)(1)(B) - Identification of Documents Regarding Liability Issues**

1. Copies of the recording "How We Do."

2. Documents defendants obtain in this litigation related to "Elevator" from plaintiffs or others, including but not limited to any documents filed with the Copyright Office.

3. All documents identified in plaintiffs' Initial Disclosures.

Defendants' investigation is ongoing, and additional categories of documents may be identified. Defendants reserve their right to identify further categories of documents regarding liability issues and, at the appropriate juncture, categories of documents regarding any alleged damages.

C. Rule 26(a)(1)(C) - Computation of Damages

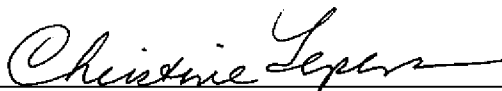
The Universal Defendants will seek an award of their attorneys' fees and costs incurred in the defense of this action.

D. Rule 26(a)(1)(D) - Insurance

Not applicable.

Dated: New York, New York
May 22, 2008

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Recordings, Inc., Interscope Records, a
division of UMG Recordings, Universal
Music Publishing Group, Inc., and
Windswept Holdings, LLC d/b/a Music
of Windswept*